

From: **David J. Strachman** <djs@mtlesq.com>

Date: Sun, Nov 14, 2010 at 7:25 AM

To: "Hibey, Richard" <rhibey@milchev.com>, "Hill, Brian" <BHill@milchev.com>, "Rochon, Mark" <mrochon@milchev.com>, "Sherman, Deming" <dsherma@eapdlaw.com>

Cc: Max Wistow <mw@wistbar.com>

Counsel,

1) Your privilege log and production are facially incomplete since you failed to include in the log or produce any of the communication between the PA/PLO and its officers etc. and persons purporting to be or who are officers etc. of the PIF or PCSC. Please confirm that you will rectify this lacuna by noon on November 15.

Absent your agreement we will move for Rule 37 sanctions.

2) In respect to the documents listed in the log we reject your assertions of privilege. Please advise by noon on November 15 whether you will withdraw your claims of privilege.

Absent your agreement we will move to compel production.

Dave Strachman

David J. Strachman  
McIntyre, Tate & Lynch, LLP  
321 South Main Street, Suite 400  
Providence, RI 02903  
(401) 351-7700  
(401) 331-6095 (fax)  
[djs@mtlesq.com](mailto:djs@mtlesq.com)